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May 18, 2021

Hon. Sidney H. Stein  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

## MEMO ENDORSED

Re: *United States v. Jimenez, et al.*  
Docket No.: 18-CR-879 (SHS)

Dear Judge Stein:

I am counsel to Defendant Irelene Nunez. I write to request that the Court modify Ms. Nunez's conditions of release to permit her to travel to the Middle District of Pennsylvania from June 11-13, 2021.

Ms. Nunez wishes to travel for a small get together to celebrate her godson's birthday. If permitted to travel, Ms. Nunez would stay at Kalahari Resort, located at 250 Kalahari Blvd., Pocono Mountain, PA 18346.

By way of background, on November 14, 2018, the Hon. Barbara C. Moses ordered Ms. Nunez released on a \$150,000 personal recognizance bond secured by the signatures of two financially responsible persons. Ms. Nunez's pretrial supervision was to be as directed by Pretrial Services, and her travel was limited to the Southern and Eastern Districts of New York. The Court has since extended Ms. Nunez's travel perimeter to include the District of New Jersey. Since her release 30 months ago, Ms. Nunez has remained fully compliant with all of the terms of her release.

I have spoken to the government, by AUSA Ni Qian, Esq., and they do not object to this request. Pretrial Services, by Officer Madalyn Toledo, takes no position on this request, but notes Ms. Nunez's continued compliance with supervision.

Your Honor's consideration is greatly appreciated.

Respectfully submitted,

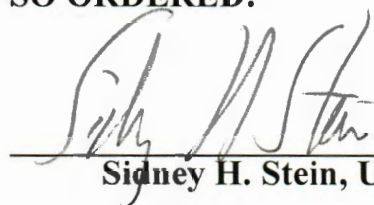
/s/ Edward V. Sapone  
Edward V. Sapone

Cc: AUSA Ni Qian, Esq.  
AUSA Daniel Nessim, Esq.  
PTSO Madalyn Toledo

**Request to travel as set forth in this letter granted.**

**Dated: New York, New York  
May 18, 2021**

**SO ORDERED:**

A handwritten signature in dark ink, appearing to read "Sidney H. Stein", is written over a horizontal line.

**Sidney H. Stein, U.S.D.J.**